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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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)	
UNITED STATES OF AMERICA,)	
)	CASE NO: 2:11-CR-00147
Plaintiff,)	
)	
vs.)	DEFENDANT ZARBOD ZANGANEH'S
)	UNOPPOSED MOTION FOR EARLY
ZARBOD ZANGANEH,)	TERMINATION OF SUPERVISED
)	RELEASE
Defendant.)	
)	
)	
)	

COMES NOW Defendant, ZARBOD ZANGANEH, by and through his attorney of record, PHILIP H. BROWN, ESQ., and moves this Honorable Court for an order for early termination of supervised release. Mr. Zanganeh has completed probation for twenty-six (26) months of the thirty six (36) month probationary period. Mr. Zanganeh has been in full compliance with all court orders and all directives of United States Probation. Early termination is warranted by Mr. Zanganeh's conduct and it is in the interests of justice. For

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those reasons, Mr. Zanganeh respectfully requests that this Honorable Court grant his motion for early termination.

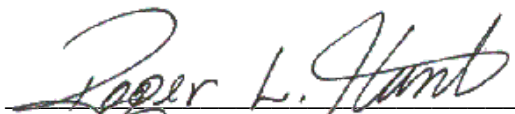
Pursuant to 18 U.S.C. §3583(e)(1) provide, the court may, after considering the factors set forth in section 3553(a)(1), (a)(2)(b), (a)(2)(C), (a)(2)(D), (a)(4), (a)(6), and (a)(7) ---

terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice.¹

On April 27, 2012, Mr. Zanganeh was sentenced to three years of supervised release for Concealment of Assets. Since that time, Mr. Zanganeh has scrupulously complied with all of the terms of his probation and has completed twenty-six (26) of the thirty-six (36) months of supervised release. Mr. Zanganeh timely paid his fine and assessment. He has complied with all of the terms of his probation and requests of his supervising officer. His supervising officer, Probation Officer Kelly Morgan, does not oppose this request of early release. Furthermore, defense counsel has spoken with Assistant United States Attorney Roger Yang and he does not oppose early termination of supervised release. Therefore, Mr. Zanganeh respectfully requests that this Court order early termination of his supervised release.

DATED this 23d day of June, 2014.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
DATED: June 25, 2014

BROWN LAW OFFICES

/s/ Philip H. Brown
PHILIP H. BROWN, ESQ.
200 Hoover Ave., #130
Las Vegas, NV 89101
Counsel for Zarbod Zanganeh

¹ Federal Rule of Criminal Procedure 32.1(c)(1) and (2) provide that the court must hold a hearing on any modification of conditions unless the hearing is waived or "the relief sought is favorable to the person and does not extend the term of probation or of supervised release" as long as the government is on notice and has not objected after having a reasonable opportunity to do so.

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of the Brown Law Offices and am a person of such age and discretion as to be competent to serve papers.

That on June 23, 2014, I served an electronic copy of the above and foregoing DEFENDANT ZARBOD ZANGANEH'S UNOPPOSED MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
ROGER YANG
Assistant United States Attorney
333 Las Vegas Blvd. S. #5000
Las Vegas, NV 89101
Counsel for United States

/s/ Mary Brown, Esq.
Employee of the Brown Law Offices